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Magistrate Judge Paula L. McCandlis

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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

MOHAMED AWEYS MUSE,

Defendant.

CASE NO. MJ23-050

COMPLAINT for VIOLATION

Title 21, U.S.C.

Sections 841(a)(1), 841(b)(1)(C)

BEFORE the Honorable Paula L. McCandlis, United States Magistrate Judge,  
U. S. Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT ONE**

**(Possession of a Controlled Substance with Intent to Distribute)**

On or about February 2, 2023, in Snohomish County, within the Western District  
of Washington, MOHAMED AWEYS MUSE did knowingly and intentionally possess,  
and aid and abet the possession of, with the intent to distribute, a controlled substance,  
including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl) and

1 cocaine, its salts, optical and geometric isomers, and salts of isomers, which are  
2 substances controlled under Title 21, United States Code.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
4 841(b)(1)(C), and Title 18, United States Code, Section 2.

5 And the complainant states that this Complaint is based on the following  
6 information:

7  
8 I, Salvatore T. Giampapa, being first duly sworn, hereby depose and state as  
9 follows:

10 **AFFIANT BACKGROUND**

11 1. I am employed as a Special Agent (SA) with the United States Drug  
12 Enforcement Administration (DEA) and have been so employed since August 2020. I am  
13 currently assigned to the Seattle Field Division. In this capacity, I investigate violations  
14 of the Controlled Substance Act, Title 21, United States Code, Section 801 *et seq.*, and  
15 related offenses. I have received specialized training in the enforcement and investigation  
16 of the Controlled Substance Act. I have received over 620 hours of classroom training  
17 including, but not limited to, drug identification, drug interdiction, detection, money  
18 laundering techniques and schemes, smuggling, and the investigation of individuals  
19 and/or organizations involved in the illegal possession, possession for sale, sales,  
20 importation, smuggling, cultivation, manufacturing, and illicit trafficking of controlled  
21 substances. Prior to becoming a SA with the DEA, I was employed as an Officer in the  
22 United States Coast Guard from May 2015 to August 2020. In that capacity, I enforced  
23 maritime law, responded to emergencies, and preserved and protected people and  
24 property. During this time, I was trained and involved in investigations of criminal  
25 offenses including, but not limited to, narcotics, smuggling, and DUI.

26 2. In my role as a SA for the Drug Enforcement Administration, I have  
27 participated in narcotics investigations (i.e., heroin, cocaine, marijuana, and

1 methamphetamine) which have resulted in the arrest of individuals and the seizure of  
2 illicit narcotics and/or narcotic-related evidence and the forfeiture of narcotics-related  
3 assets. I have been involved in the service of search warrants as part of these  
4 investigations. Because of my experience in serving these search warrants, I have  
5 encountered and have become familiar with various tools, methods, trends, paraphernalia,  
6 and related articles utilized by various traffickers in their efforts to import, conceal, and  
7 distribute controlled substances. I am also familiar with the various methods of  
8 packaging, delivering, transferring, and laundering drug proceeds. Additionally, through  
9 my training and experience, I can identify illegal drugs by sight, odor, and texture.

10 3. I have participated in the debriefing of defendants, witnesses, and  
11 informants, during which I have discussed with them their methods of drug smuggling,  
12 distribution, packaging, trafficking, avoiding law enforcement, and laundering proceeds,  
13 among other concerns related to drug trafficking. I have discussed and learned from other  
14 law enforcement investigators in regard to these matters as well.

15 4. In addition to practical experience, I have received formal training in  
16 controlled substances enforcement. This includes training regarding controlled substance  
17 recognition, field testing, undercover investigations, telecommunications analysis,  
18 surveillance techniques, financial investigations, and clandestine laboratories.

19 5. The facts set forth in this Affidavit arise from my personal and direct  
20 participation in the investigation, my experience and training as a DEA Special Agent,  
21 my conversations with witnesses and other law enforcement personnel participating in  
22 this and related investigations, and my review of relevant documents and reports. I have  
23 not included each and every fact known to me or other investigative personnel  
24 concerning this investigation. My specialized training and experience in drug  
25 investigations, as well as the assistance and input of experienced fellow investigators,  
26 form a basis for my opinions and conclusions, which I draw from the facts set forth  
27 herein.

## THE INVESTIGATION

6. The United States is conducting a criminal investigation of MOHAMED AWEYS MUSE regarding possible violations of 21 U.S.C. § 841(a)(1) (Distribution of a Controlled Substance, Possession of a Controlled Substance with Intent to Distribute), 18 U.S.C. § 924(c) (Possessing a Firearm in Furtherance of a Drug Trafficking Offense), and related offenses.

### December 2022 Investigation of MUSE

7. In December 2022, a Confidential Source (CS) advised DEA and FBI investigators that CS has firsthand knowledge of an individual, known as “A-town” to CS, and has had direct conversations with “A-town.” Investigators later identified “A-town” as MUSE from law enforcement data and CS confirmed this when investigators showed CS a driver’s license photo of MUSE.

8. According to CS, MUSE is originally from Atlanta, Georgia,<sup>1</sup> and traffics M30 pills in the area of South Holgate Street and Airport Way South in Seattle, Washington. I know based on my training and experience that M30 pills are stamped with “M” and “30” and are often blue, but sometimes green, and often contain fentanyl. CS stated that MUSE targets individuals in the area who are clients of the methadone clinic located at Evergreen Treatment Services on Airport Way South. CS also stated they had observed firsthand that MUSE consistently carries a firearm with him.

9. CS stated that in their direct interaction with MUSE, MUSE showed CS multiple kilograms of suspected narcotics, including blue M30 pills and suspected cocaine and heroin, as well as multiple firearms, which MUSE stated to CS were for sale, while in an apartment located at 23420 91st Ave S, Apartment 303, Kent, Washington 98031, in south King County, Washington (APARTMENT 1).

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<sup>1</sup> I have reviewed the criminal history of MUSE: he has been arrested multiple times, beginning from an arrest dating back to 2003 in Georgia at age 16. He had been arrested, prosecuted, and acquitted in 2004 for armed robbery and aggravated assault in Dekalb County Superior Court, in Atlanta, Georgia.

1           10. CS also stated they observed two other Hispanic males in APARTMENT 1.  
2 According to CS, MUSE had a separate room, but appeared to be sharing APARTMENT  
3 1 with the other two males.

4           11. CS gave investigators a phone number, (404) 513-9240 (TT), which MUSE  
5 represented to CS as being MUSE's phone number.

6           12. CS has been a confidential source with the Seattle Police Department  
7 (SPD) since fall of 2007. CS was a confidential source for the FBI from summer of 2014  
8 to spring of 2015. CS was not closed for cause by the FBI, and the FBI re-activated CS as  
9 a source as of January 2023. CS has provided credible and reliable information in the past  
10 on other narcotics, firearms, and gang investigations, which has been corroborated by  
11 physical surveillance and independent source reporting and led to numerous federal  
12 arrests and search warrant executions. CS has gross misdemeanor or misdemeanor  
13 convictions, all from over six years ago, for criminal trespass, criminal impersonation,  
14 drug possession solicitation (providing false information on a prescription), driving with  
15 suspended license, and violation of the Uniform Controlled Substances Act. CS is a paid  
16 informant, is not working off a charge, and is not willing to testify in court in connection  
17 with this investigation.

18 Law Enforcement Surveillance of MUSE

19           13. Since December 1, 2022, King County Sheriff's Office (KCSO)  
20 investigators have been investigating narcotics trafficking in the area of South Holgate  
21 Street and Airport Way South, and identified MUSE as the primary narcotics trafficker  
22 for that area.

23           14. On five different occasions in December 2022, KCSO investigators  
24 observed MUSE conducting what appeared to be hand-to-hand narcotics transactions, all  
25 in that location. KCSO investigators observed MUSE driving a yellow Volkswagen  
26 Beetle with Utah license plate F562KJ on multiple occasions and appearing to be  
27 conducting deals from that vehicle. Investigators recognized MUSE because they arrested

1 him in 2016 for selling Xanax pills at the bus stop located at South Holgate Street and  
2 Airport Way South.

3 15. On December 19, 2022, SPD investigators ran a database query on the  
4 vehicle that MUSE was observed driving, the yellow Volkswagen Beetle with Utah  
5 license plate F562KJ, and found that the vehicle was impounded by Washington State  
6 Patrol (WSP) as the result of a hit and run incident. According to the WSP officer's  
7 report, a witness reported seeing a Hispanic male exit the vehicle and flee the scene. That  
8 same day, an SPD K-9 was applied to the vehicle, but the K-9 did not alert to the  
9 presence of narcotics. However, Washington State Certified K-9's are not trained and  
10 certified in the detection of fentanyl.

11 16. In 2019, the Tacoma Police Department (TPD) investigated MUSE for  
12 narcotics trafficking. According to TPD's report, in 2019, TPD executed a search warrant  
13 on MUSE's apartment and storage unit at the time: this apartment was listed as MUSE's  
14 address in Department of Licensing records, and TPD followed MUSE to this apartment  
15 after two controlled purchases. According to TPD's report, US Postal inspectors had  
16 intercepted a package containing 10 ounces of cocaine that MUSE mailed to this address.  
17 During TPD's search of MUSE's apartment and storage unit, TPD seized several ounces  
18 of narcotics and six firearms. The case was referred to the Pierce County Prosecuting  
19 Attorney's Office, but no charges were filed.

20 17. On December 29, 2022, DEA and SPD investigators conducted  
21 surveillance in the vicinity of South Holgate Street and Airport Way South. Investigators  
22 identified MUSE based on a Washington State Driver's License Photo and observed  
23 MUSE enter and exit a parked black Dodge Challenger several times and conduct several  
24 hand-to-hand transactions. Based on my training and experience, hand-to-hand  
25 transactions of the type investigators observed—in which individuals furtively exchange  
26 something very small—are consistent with drug transactions, especially sales of small  
27 quantities of drugs to either individual users or small-time street dealers. Further, the



1 repeated return to the vehicle leads your affiant to believe that MUSE was storing  
2 narcotics in his vehicle and returning between transactions to collect more narcotics.  
3 Investigators maintained surveillance on MUSE when he drove away. Investigators  
4 observed him as he appeared to be talking on the phone between 12:31 and 12:33 p.m.  
5 Investigators continued to follow him as he drove through south Seattle. Investigators  
6 then observed him conduct what appeared to be two more hand-to-hand transactions from  
7 the vehicle.

8 18. After some time, investigators observed MUSE begin to drive somewhat  
9 erratically, slowing down and stopping at odd intervals, turning down a dead-end street  
10 and driving around a block. In my training and experience, this behavior is common for  
11 narcotics traffickers while driving and is indicative of traffickers attempting to identify  
12 and lose investigators conducting surveillance. Investigators lost surveillance of MUSE a  
13 short time later.

14 Identification of MUSE as the User of TT

15 19. Over the course of their investigation, KCSO found records of an eviction  
16 for Mohamed A. MUSE from Salmon Creek Apartments, 750 S.W. 96th Circle Apt 203,  
17 Seattle, Washington 98106 in September of 2019. This document lists TT as the contact  
18 number for Mohamed A. MUSE.

19 20. Investigators entered TT into Cash App, a cellphone application which  
20 facilitates electronic person-to-person payments. Based on my training and experience,  
21 Cash App is often used by narcotics traffickers in lieu of cash payments for narcotics.  
22 Each user on Cash App has a profile with a user name associated with their account and a  
23 phone number. When investigators entered TT into Cash App, there was a profile  
24 associated with TT. The profile picture showed a black Dodge Challenger similar to the  
25 vehicle that MUSE was observed driving on December 29, 2022. The account user name  
26 was "\$highwayatl1" and the account showed that the user joined Cash App in July 2020.  
27

1 The “atl” portion of the user name may be a reference to Atlanta, where CS reported  
2 MUSE was from.

3 21. Investigators conducted a database search of financial transactions that  
4 corresponded to TT. Several transactions list TT as the payee phone number. These same  
5 transactions list Mohamed A. MUSE as the payee for the transactions.

6 22. An administrative subpoena return from AT&T shows that the subscriber  
7 for TT is listed as John Doe at 819 E PIKE ST, SEATTLE, WA 98122. A Google search  
8 of that address shows it is the address for an AT&T store in downtown Seattle. John Doe  
9 is a commonly used alias. Based on my training and experience, it is common for  
10 narcotics traffickers to use false subscriber information for their phones in order to avoid  
11 detection by law enforcement.

12 Toll analysis of TT

13 23. As detailed in paragraph 21, investigators observed MUSE appear to be  
14 speaking on the phone between 12:31 and 12:33 p.m. on December 29, 2022. Toll  
15 analysis shows that a phone call was made to TT at 12:26 pm on December 29, 2022. The  
16 phone call lasted for approximately 9 minutes and 16 seconds, encompassing the period  
17 of time that investigators observed MUSE appear to be speaking on the phone.

18 24. An analysis of toll records for TT showed that MUSE had approximately  
19 four calls/texts with phone number (206) 468-7770 on October 30 and 31, 2022. A search  
20 of a law enforcement database shows (206) 468-7770 is associated to Miguel A. Ortiz.  
21 Miguel A. Ortiz was convicted in 2010 in Pierce County for *Possession with Intent to*  
22 *Distribute of a Controlled Substance* and *Unlawful Possession of a Firearm*. More  
23 recently, Miguel A. Ortiz was arrested by KCSO for *Assault* and *Unlawful Firearm*  
24 *Possession* on November 11, 2022.

25 25. Toll records for TT also showed that MUSE had approximately seven  
26 calls/texts with phone number (206) 476-9464 from November 9, 2022, to December 23,  
27 2022. A report from the Mason County Sheriff’s Office on November 16, 2022, shows



1 (206) 476-9464 as a contact number for Jesse R. Long. Jesse R. Long was convicted in  
2 October of 2020 in Kitsap County for *Delivery of a Controlled Substance*.

3 26. Toll records for TT also showed that MUSE had one call/text with phone  
4 number (425) 239-6302 on September 17, 2022. A search of law enforcement databases  
5 shows (425) 239-6302 is associated with Devon M. Williamson. Devon M. Williamson  
6 was convicted in 2018 in Snohomish County for *Unlawful Possession of a Firearm*.

7 27. Toll records for TT also showed that MUSE had approximately 73  
8 calls/texts with phone number (206) 618-1443 from September 19, 2022, to November  
9 30, 2022. A report from Mukilteo Police Department on December 16, 2022, shows (206)  
10 618-1443 as a contact number for Siyad Abdullahi Shamo. Siyad Abdullahi Shamo was  
11 convicted in October of 2016 for *Attempted Robbery* and in 2015 for *Conspiracy to*  
12 *Deliver Controlled Substances* in King County Superior Court.

13 28. On January 9, 2023, US Magistrate Judge Brian Tsuchida signed a warrant  
14 authorizing the location tracking of TT. Investigators began receiving location  
15 information for TT on the same day.

16 Further Surveillance of MUSE

17 29. On January 11, 2023, at approximately 5:00 am, investigators observed  
18 MUSE leaving the building where APARTMENT 1 is located and entering his vehicle  
19 and departing the area to the north. His movements as observed by investigators matched  
20 the location reports of TT.

21 30. On January 13, 2023, at approximately 5:00 am, investigators observed  
22 MUSE exit from APARTMENT 1. MUSE departed the area in his vehicle and again his  
23 movements matched the location data of TT.

24 31. On January 18, 2023, at approximately 5:00 am, investigators observed  
25 MUSE leaving the building where APARTMENT 1 is located and depart the area in his  
26 vehicle. Investigators maintained surveillance on MUSE as he drove to the area of South  
27 Holgate Street and Airport Way South, while making two stops along the way.

1 Investigators observed MUSE conduct what appeared to be several hand-to-hand  
2 transactions both inside and outside of his vehicle. On at least one occasion immediately  
3 following a hand-to-hand transaction, investigators observed an unidentified individual  
4 depart the area of South Holgate Street and Airport Way South while simultaneously  
5 pulling what appeared to be folded up tinfoil and a lighter from their pocket. I know  
6 based on my training and experience that M30 fentanyl pills are most often smoked by  
7 placing a pill on tinfoil and heating the pill with a lighter while simultaneously inhaling.  
8 Investigators observed MUSE drive his vehicle at random intervals to locations a few  
9 blocks away and then return to South Holgate Street and Airport Way South. Based on  
10 my training and experience, this behavior is consistent with narcotics dealers attempting  
11 to identify law enforcement surveillance. Investigators also observed people enter and  
12 exit his vehicle's passenger seat after short periods of time while MUSE was observed in  
13 the driver's seat. Based on my training and experience, I know it is also common for  
14 narcotics dealers to conduct transactions in the cover of their vehicle to avoid detection  
15 by law enforcement, especially for transactions involving larger amounts of cash and  
16 narcotics. Investigators maintained surveillance on his vehicle and MUSE as he returned  
17 to the area of APARTMENT 1. Investigators did not observe MUSE enter or exit  
18 APARTMENT 1 at this time, but observed his vehicle enter the apartment complex,  
19 which has only one exit/entrance for vehicles. A short time later, investigators observed  
20 his vehicle drive to Seattle-Tacoma Airport and observed MUSE exit the vehicle, enter  
21 the terminal, and speak to a Delta Airlines ticket counter employee. Investigators later  
22 determined that MUSE had missed a scheduled flight to Atlanta, GA and the next flight  
23 was scheduled for 3:15 pm that afternoon and MUSE had purchased a ticket for that later  
24 flight. Investigators observed MUSE re-enter his vehicle and drive directly to South  
25 Holgate Street and Airport Way South. Investigators then terminated surveillance. Later  
26 that same day at approximately 3:07 pm, location data for TT showed it was at Seattle-

1 Tacoma International Airport. At approximately 7:55 pm, location data showed that TT  
2 was in Atlanta, GA.

3 32. Location data for TT showed that MUSE returned to the Seattle area on the  
4 evening of January 25th, 2023. TT location information showed that MUSE stayed  
5 overnight in the vicinity of APARTMENT 1 on the evenings of January 25th, 26th, and  
6 27th, 2023.

7 Historical location analysis of TT

8 33. Investigators conducted analysis on historical location and SMS/Phone call  
9 data of TT for dates ranging from October 1, 2022 to January 10, 2023. This analysis  
10 shows that of the 9422 location data points, 2427 of them were in range of  
11 APARTMENT 1. This indicates that TT spent approximately 25% of the time from  
12 October 1, 2022 to January 10, 2023 in the area of APARTMENT 1. Additionally, a total  
13 of 2498 SMS and calls were made and received by TT via cell towers in the vicinity of  
14 APARTMENT 1 out of a total of 8547 calls and SMS sent and received by TT from  
15 October 1, 2022 to January 10, 2023. This indicates that approximately 29% of phone  
16 calls and SMS sent and received by TT from October 1, 2022 to January 10, 2023 were in  
17 the vicinity of APARTMENT 1.

18 Surveillance of MUSE and TT

19 34. Location information for TT showed that on the evenings of January 28<sup>th</sup>  
20 and 29<sup>th</sup>, 2023, MUSE stayed overnight in the vicinity of 200<sup>th</sup> St SW and 50<sup>th</sup> Ave W in  
21 Lynnwood, WA. This data indicated MUSE had a new location where he was staying  
22 overnight which was not previously known to law enforcement. Law enforcement  
23 confirmed from surveillance that MUSE was staying overnight at 19802 48th Ave West,  
24 Building "O," Apartment 2, Lynwood, Washington 98036 (APARTMENT 2). Location  
25 data further showed that during the day, MUSE would periodically return to  
26 APARTMENT 1.

1           35. On January 30, 2023, the Honorable Judge John L. Weinberg signed Search  
2 Warrants for APARTMENT 1, MUSE's vehicle, and Mohamed MUSE's person.

3           36. In preparation for serving the search warrants on the morning of January  
4 31, investigators established surveillance on MUSE in downtown Seattle. Investigators  
5 observed MUSE outside of his vehicle conduct several hand-to-hand transactions in the  
6 area of South Holgate Street and Airport Way South. Later in the afternoon, MUSE  
7 departed the area in his vehicle and investigators followed throughout downtown Seattle.  
8 After approximately an hour, he began driving erratically and investigators lost sight of  
9 him. Investigators believed that MUSE may have detected the surveillance and drove  
10 erratically in order to avoid it. Location data for TT showed that MUSE drove north on I-  
11 5, exited I-5 in Lynnwood near APARTMENT 2, then continued north.

12           37. Investigators continued to monitor location data for TT. TT traveled north  
13 towards Everett, then south and spent time in Tukwila, Des Moines and south Seattle.  
14 Later in the evening, location data showed TT in the vicinity of APARTMENT 1.  
15 Investigators began making preparations to serve the search warrants on APARTMENT  
16 1, but a short time later TT departed the area and returned to the vicinity of  
17 APARTMENT 2 in Lynnwood, where it remained overnight.

18           38. The morning of January 31, 2023, investigators located MUSE's vehicle in  
19 the parking lot of an apartment complex. At approximately 5:00 am, investigators  
20 observed MUSE exit APARTMENT 2, approach his vehicle, and start it, before re-  
21 entering APARTMENT 2. At approximately 5:36 am, investigators observed MUSE exit  
22 APARTMENT 2, enter his vehicle and depart the area, traveling south. Investigators  
23 maintained surveillance as MUSE's vehicle go through the drive thru at Starbuck in  
24 Northgate Way before continuing directly to South Holgate Street and Airport Way  
25 South.

26           39. Investigators maintained surveillance on MUSE as several individuals  
27 approached the driver's side window of his vehicle. MUSE conducted what appeared to

1 be several hand-to-hand drug transactions from his vehicle. After one of these  
2 transactions, I observed one individual ignite a lighter under what appeared to be a tinfoil  
3 in a manner consistent with someone smoking an M30 pill. On another occasion, I  
4 observed a different individual approach his vehicle and after a short time, drop what  
5 appeared to be a small baggie on the ground beside the vehicle before picking it up and  
6 departing the area.

7 40. Based on my training and experience, I know that drug traffickers who  
8 have a primary residence, such as APARTMENT 1, also frequently stay overnight at  
9 secondary residences, such as APARTMENT 2, stash their drugs there, and sell the drugs  
10 in hand-to-hand transactions the next day. I also know that drug traffickers who stay  
11 overnight at multiple residences leave behind drugs and packaging in  
12 their primary residence as well as take their drugs with them to secondary residences.

13 41. On February 1, 2023, The Honorable Judge Mary Alice Theiler signed a  
14 Search Warrant for APARTMENT 2.

15 Service of Search Warrants at APARTMENTS 1 and 2

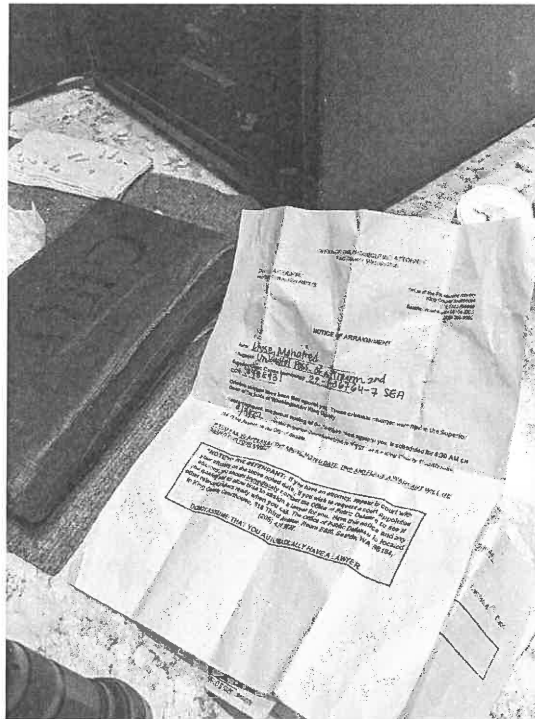
16 42. On February 2, 2023, investigators executed search warrants on  
17 APARTMENTS 1 and 2. MUSE was taken into custody from APARTMENT 2. In  
18 APARTMENT 2, investigators found (1) approximately 364.2 grams of a white powdery  
19 substance, which field-tested positive for cocaine, and (2) approximately 293.2 grams of  
20 blue pills, stamped with M and 30, which field-tested positive for fentanyl. The narcotics  
21 were located in the closet of the sole bedroom of the apartment. Investigators also found  
22 2 firearms in a backpack on the floor of the bedroom. Investigators also found a third  
23 firearm in a cupboard in the kitchen.

24 43. Investigators detained and later interviewed a second individual who was  
25 identified as S.S. who was at APARTMENT 2. S.S. denied any knowledge of the  
26 firearms or narcotics found. However, S.S. driver's license was located in the bedroom  
27 where the narcotics and 2 firearms were located. S.S. claimed that no one slept in the



1 bedroom, but that the clothes and other items in the bedroom belonged to S.S. S.S. also  
2 stated that the apartment was leased in his name.

3 44. At APARTMENT 1, investigators found a safe in a gym bag in the living  
4 room. Inside the safe, investigators found approximately 1194.8 grams of a white  
5 powdery substance wrapped in blue tape with the writing, in black marker, "CHU," on it.  
6 The substance field-tested positive for cocaine. Also found in the safe were several  
7 documents with the name Mohamed MUSE, including official court documents.  
8 Investigators also found approximately 4 ounces of a white powdery substance in a  
9 drawer in the bathroom, which field-tested positive for cocaine.




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22 45. Later that same morning, investigators read MUSE his Miranda rights and  
23 MUSE agreed to waive his rights and talk with investigators. MUSE stated that all of the  
24 narcotics and firearms at APARTMENT 2 were his, and that S.S. had no knowledge or  
25 involvement of the firearms or narcotics. MUSE stated that he kept the firearms for  
26 protection. MUSE stated that the narcotics in the safe in APARTMENT 1 were his, but  
27



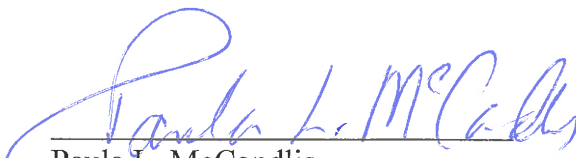
1 that nothing outside of the safe belonged to him. This interview was audio recorded and  
2 submitted as evidence.

3 Based on the above facts, I respectfully submit that there is probable cause to  
4 believe that Mohamed MUSE did knowingly and intentionally possess controlled  
5 substances with intent to deliver, in violation of Title 21, United States Code, Sections  
6 841(a)(1) and (b)(1)(C).

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11   
12 Salvatore T. Giampapa, Complainant  
13 Special Agent, Drug Enforcement  
14 Administration

15 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
16 presence, the Court hereby finds that there is probable cause to believe the Defendant  
17 committed the offenses set forth in the Complaint.

18 Dated this 2nd day of February, 2023.

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20   
21 Paula L. McCandlis  
22 United States Magistrate Judge  
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